

**Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Annual Assessment of the Status of	)	MB Docket No. 02-145
Competition in the Markets for the	)	
Delivery of Video Programming	)	

**COMMENTS OF DIRECTV, INC.**

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DIRECTV, Inc.<sup>1</sup> (“DIRECTV”) hereby submits the following comments in response to the Commission’s Notice of Inquiry in the above-captioned matter.<sup>2</sup>

**I. INTRODUCTION AND SUMMARY**

As of the end of June 2002, DIRECTV had 10.7 million subscribers nationwide. Using seven high-powered direct broadcast satellites at three orbital locations, DIRECTV currently offers more than 225 national channels of digitally-delivered entertainment, educational, and informational programming directly to homes and businesses equipped with the DIRECTV® System, which features small satellite dish antennas. Eight years after launching its first satellite, DIRECTV remains committed to providing consumers with a multichannel video programming distributor (“MVPD”) alternative to incumbent cable television operators.

By devoting an enormous amount of resources to state-of-the-art technologies, and by utilizing the additional DBS frequencies and orbital locations it has acquired in recent years, DIRECTV has been able to improve and increase the variety of its services and offer consumers

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<sup>1</sup> DIRECTV is a wholly owned subsidiary of DIRECTV Enterprises, LLC, a licensee in the DBS service and a wholly-owned subsidiary of Hughes Electronics Corporation.

<sup>2</sup> *In the Matter of Annual Assessment of the Status of Competition in the Market for the Delivery of Video Programming*, MB Docket No. 02-145, FCC 02-178, Notice of Inquiry (2002) (“Notice”).

more attractive program packages, including the offering of local broadcast channels via satellite in 44 television markets. This commitment of resources has enhanced DIRECTV's ability to compete with cable incumbents that continue to dominate the MVPD marketplace.

As a stand-alone company, however, DIRECTV's ability to provide local channels in Designated Market Areas ("DMAs") throughout the country and expand its programming choices in order to compete with cable incumbents is significantly limited by capacity constraints. DIRECTV's parent companies, Hughes Electronics Corporation and General Motors Corporation, are party to a merger agreement with EchoStar Communications Corporation that will merge the EchoStar and DIRECTV DBS services. The combined spectrum resources of EchoStar and DIRECTV will alleviate those capacity constraints so as to enable DBS to compete more aggressively with the cable incumbents.

Regulatory approval of the merger will eliminate the duplication of hundreds of channels of programming by the two companies, which, in turn, will enable the merged company to offer local channel service in every DMA in the country and expanded program offerings, all at highly competitive prices set on a uniform nationwide basis. In addition, the merged company will be better equipped to compete directly with cable incumbents by expanding the deployment of specialized services such as HDTV, video-on-demand/personal video recorder (PVR) functionality, pay-per-view, and interactive services. The merger will result in an estimated \$1 billion per year in consumer welfare benefits. Approval of the merger will be the single most important factor in fostering stronger competition to the cable incumbents.

DIRECTV below addresses a number of issues and data requests raised in the Notice. As DIRECTV has pointed out extensively in other proceedings, the progress DIRECTV and other DBS operators have made thus far in introducing a viable competitive alternative to cable

continues to be threatened by three regulatory developments in the MVPD marketplace: (i) the failure of the Commission to address the serious threat of harmful interference posed by new, proposed services or service providers that seek to share the mission-critical frequency band designated for primary use by United States DBS operators; (ii) increasing regulatory demands on DBS capacity; and (iii) the evasion of the program access law that was enacted to prevent anticompetitive activity by vertically-integrated cable incumbents. These critical issues must be monitored and addressed by the Commission if DBS is to continue to progress as an MVPD competitor.

## **II. REGULATORY IMPEDIMENTS TO DBS PROVIDERS IN THE MVPD MARKETPLACE**

The Commission seeks comment on the impact of the current regulatory environment in encouraging vigorous competition in the market for the delivery of video programming, as well as any remaining statutory or regulatory barriers to competition.<sup>3</sup> From DIRECTV's perspective, there remain at least three major regulatory developments in the MVPD market that threaten DBS as an effective cable competitor, which are described below.

### **A. Interference in the 12 GHz Band**

Recognizing the importance of protecting and supporting the growth of DBS services, the Commission historically has been committed to clearing the 12.2-12.7 GHz frequency band (the "12 GHz Band") – the primary downlink spectrum used by DBS providers – of sources of unacceptable interference.<sup>4</sup> In the past few years, however, the Commission has taken steps to introduce several new sources of interference into the 12 GHz Band.

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<sup>3</sup> Notice at ¶ 10.

<sup>4</sup> See, e.g., *Public Notice, Initiation of Direct Broadcast Satellite Service – Effect on 12 GHz Terrestrial Point-to-Point Licensees in the Private Operational Fixed Service*, 10

DIRECTV has repeatedly urged the Commission to refrain from introducing services into the 12 GHz Band that will degrade U.S. DBS service and thereby jeopardize the progress DBS operators have achieved to date in competing with cable incumbents. There is ample other spectrum available to accommodate new MVPD competitors. DIRECTV reiterates these concerns below.

1. ***Proposed NGSO Systems***

Companies such as Skybridge, Virtual Geosatellite, and Boeing have proposed to use frequencies designated for DBS service to operate NGSO FSS systems. Specifically, these companies have proposed to operate NGSO downlinks in frequencies ranging from 10.7-12.7 GHz, which would overlap with the entire 12.2-12.7 GHz Band used by DBS for service downlinks.<sup>5</sup> For the reasons DIRECTV explained in the NGSO FSS rulemaking proceeding, its comments on individual NGSO FSS applications, and its pending reconsideration petition of the NGSO FSS proceeding, the Commission should make it a priority to preserve the interference-free use of the frequency bands designated for primary use by DBS services.<sup>6</sup>

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FCC Rcd 1211 (1994) (reminding remaining 12 GHz terrestrial licensees that they should relocate their operations to other available frequency bands or alternative facilities).

<sup>5</sup> In the Matter of Redesignation of the 17.7 – 19.7 GHz Frequency Band, Blanket Licensing of Satellite Earth Stations in the 17.7 – 20.0 GHz and 27.5 – 30.0 GHz Frequency Bands, and the Allocation of Additional Spectrum in the 17.3 – 17.8 GHz and 24.75 – 25.25 GHz Frequency Bands for Broadcast Satellite Service Use, IB Docket No. 98-172, RM-9005, RM-9118, FCC 00-212, *Report and Order* (rel. June 22, 2000), at ¶ 96. NGSO FSS systems had also proposed to use the 17.3 - 17.8 GHz frequency band, which is designated for DBS uplinks, for NGSO FSS gateways, but the Commission declined to adopt this proposal. *See First Report and Order and Further Notice of Proposed Rulemaking*, ET Docket No. 98-206 (Dec. 8, 2000) ("NGSO FSS/Northpoint Order"), at ¶ 158.

<sup>6</sup> *See, e.g.*, Petition for Reconsideration of DIRECTV, Inc., ET Docket No. 98-206 (filed Mar. 19, 2001), at 23-26; Reply of DIRECTV, Inc., ET Docket No. 98-206 (filed May 9, 2001), at 11-17; Comments of DIRECTV, Inc., ET Docket No. 98-206 (Mar. 2, 1999), at 7-23 & Appendix A; Reply Comments of DIRECTV, Inc., ET Docket No. 98-206 (Apr. 14, 1999), at 30-39; *see also* Petition to Defer Consideration of, or Hold in Abeyance,

Before the Commission licenses specific NGSO systems proposing to use the 12 GHz band, DIRECTV believes that the Commission must ensure that existing and future DBS operations – in which DBS operators collectively have invested billions of dollars and which today serve more than 17.7 million subscribers – are not adversely affected by NGSO operations. While much progress has been made in international regulatory forums and at the Commission in developing criteria for the co-existence of DBS and NGSO systems, DIRECTV reiterates the need for the Commission to proceed with care in processing NGSO system applications until such compatibility is conclusively established.

## **2. *Northpoint Technology***

During the past few years, Northpoint Technology, Ltd. and its affiliates, Broadwave USA and Diversified Communication Engineering (collectively “Northpoint”), have been engaged in an effort to introduce a terrestrial point-to-multipoint service into the 12 GHz band on a non-interference basis. The proposed service, designated by the Commission as Multichannel Video Distribution and Data Service (“MVDDS”), has emerged as the most serious interference threat to DBS to date.

As DIRECTV has demonstrated in numerous filings before the Commission, Northpoint and other proposed MVDDS systems should not be introduced at 12 GHz given the interference scenarios that become clearer with every new test of these technologies<sup>7</sup> and the alternate

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and Comments of DIRECTV on Applications for Authority to Launch and Operate Non-Geostationary Satellite Systems at Ku Band (filed June 30, 1999).

<sup>7</sup> DIRECTV and EchoStar reported on the harmful interference into DBS operations observed during tests conducted by the DBS operators in Oxon Hill, Maryland. See DIRECTV, Inc. and EchoStar Satellite Corp., *Report of Interference Impact on DBS Systems from Northpoint Transmitter Operating at Oxon Hill, MD, May 22 to June 7, 2000* (July 25, 2000). The interference observed was consistent with interference observations made by DIRECTV during Northpoint’s Washington, D.C. demonstrations. See, e.g., DIRECTV Inc., *Conclusions to Date Regarding Harmful Interference From a*



spectrum available to house such a service. Last year, an independent report by the MITRE Corporation ("MITRE"), commissioned by the Commission at the behest of Congress, found that the introduction of a Northpoint-type service into the 12 GHz Band "currently reserved for DBS poses a *significant interference threat* to DBS operation in many realistic operational situations."<sup>8</sup> The MITRE Report confirmed the DBS operators' predictive modeling and analyses of both Northpoint and DBS operator field tests, all of which demonstrated harmful interference similar in magnitude to the "significant" interference observed by MITRE.

Unfortunately, the Commission has continued down a path of grossly inadequate protection of DBS licensees' provision and their subscribers' receipt of service. In its recently-released Second Report and Order<sup>9</sup> in the MVDDS proceeding, the Commission adopted technical parameters purportedly designed to protect DBS operators and subscribers from harmful interference, but that do nothing of the kind. To the contrary, the Second Report and

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*Proposal Northpoint Technology Terrestrial System Operating in the DBS Downlink Band, 12.2 – 12.7 GHz* (Jan. 27, 2000). DIRECTV also provided extensive analysis of Northpoint's Austin, Texas test data in its filings in ET Docket No. 98-206. *See e.g.*, Comments of DIRECTV, Inc., *Amendment of Parts 2 and 25 of the Commission's Rules to Permit Operation of NGSO FSS Systems Co-Frequency, with GSO and Terrestrial Systems in the Ku-band Frequency Range*, ET Docket No. 98-206, (filed Mar. 2, 1999); Reply Comments of DIRECTV (filed Apr. 14, 1999); Opposition of DIRECTV, *In the Matter of Broadwave Albany, L.L.C., et al., Requests for Waiver of Part 101 of the Commission's Rules*, DA 99-494 (filed Apr. 12, 1999). *See also Application of DIRECTV, Inc., For Expedited Review and Request for Immediate Suspension of Testing, In the Matter of Diversified Communication Engineering, Inc., Experimental Special Temporary Authorization*, File No. 0094-EX-ST-1999, Call Sign WA2XMY (June 25, 1999).

<sup>8</sup> The MITRE Corporation, *Analysis of Potential MVDDS Interference to DBS in the 12.2-12.7 GHz Band* (April 2001) (the "MITRE Report"), at xvii, 6-1 (emphasis supplied); *see Public Notice*, "Comments Requested on The MITRE Corporation Report on Technical Analysis of Potential Harmful Interference to DBS from Proposed Terrestrial Services in the 12.2-12.7 GHz Band (ET Docket 98-206)," DA 01-933 (rel. April 23, 2001).

<sup>9</sup> *Second Report and Order*, ET Docket No. 98-206 (May 23, 2002).

Order “sanctions the severe disruption of DBS service for an untold number of consumers,”<sup>10</sup> and undercuts the very benefits of MVPD competition that the Commission has spent decades attempting to promote in fostering the growth of DBS. DIRECTV has asked the Commission to reconsider this potentially disastrous decision.<sup>11</sup>

3. ***Proposed DBS System of SES Americom at 105.5° W.L.***

In April of this year, SES Americom, Inc. (“SES”), a foreign satellite operator, filed a petition for declaratory ruling that it would be in the public interest for SES to build, launch and operate a new DBS satellite at the 105.5° W.L. orbital position. SES proposes to develop a platform that will offer satellite capacity to third parties who will provide direct-to-home services to consumers in the United States as well as certain British Overseas Territories in the Caribbean. The Commission has sought comment on this proposal.

DIRECTV has opposed the SES petition as procedurally defective, and on the merits, has shown that SES’s proposal poses a threat to both current and future U.S. DBS operations.<sup>12</sup> Although it has yet to design, construct, launch or obtain a license for its proposed satellite, SES asks the Commission to depart from the framework of nine degree spacing upon which U.S. DBS operators have relied in spending billions of dollars to launch and deploy U.S. DBS systems. If deployed, the SES satellite will interfere with currently-deployed U.S. DBS

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<sup>10</sup> *Id.*, Statement of Commissioner Kevin J. Martin at 15.

<sup>11</sup> Petition for Reconsideration of DIRECTV, Inc., ET Docket No. 98-206 (filed July 26, 2002). In addition, on July 18, 2002, DIRECTV filed in the United States Court of Appeals for the District of Columbia a Petition for Review of the Commission’s underlying decision that sharing between DBS and MVDDS is possible, arguing that the authorization of MVDDS operations in the 12 GHz band exceeds the Commission’s authority, is an abuse of discretion, is arbitrary and capricious, and is otherwise contrary to law. *DIRECTV, Inc. v. Federal Communications Comm’n and the United States of America*, D.C. Cir. (filed July 19, 2002).

<sup>12</sup> See In the Matter of SES Americom, Inc., SAT-PDR-20020425-00071, Opposition of DIRECTV, Inc. (June 17, 2002).

satellites. Worse, SES claims that its satellite should be accorded interference protection priority over a number of current and planned DBS satellites, including DBS spot-beam satellites that are critical to offering U.S. DBS subscribers satellite-delivered local broadcast signals. If SES's proposed satellite is accorded such interference protection, there is a significant risk that the number of local television markets that can be served by DIRECTV will be dramatically reduced, and there will be a serious design constraint on the future growth and development of all U.S. DBS systems. Although DIRECTV does not oppose SES finding a less disruptive way to provide DTH service in the United States, for example, by using future orbital locations to be allocated for BSS service in "expansion" BSS frequencies at 17 GHz, the current SES proposal should be denied.

**B. Increased Regulatory Demands on DBS Capacity**

While the Commission is allowing increased interference in the frequency bands designated for primary DBS use and thereby diminishing the quality of DBS transmissions, the Commission also is imposing ever-greater regulatory burdens on DBS operators' system capacity.<sup>13</sup> DBS systems, which already were required to comply with the closed captioning and political broadcasting rules and to reserve 4% their channel capacity for noncommercial

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<sup>13</sup> Regulatory approval of the EchoStar/Hughes merger, which will combine the DISH Network and DIRECTV DBS services, will eliminate the duplication of hundreds of channels of programming by the two companies and thereby alleviate the capacity constraints that the DBS providers currently face.

programming of an educational or informational nature,<sup>14</sup> are now also required to provide video description services for certain video programming.<sup>15</sup>

In addition, DBS operators are subject to onerous mandatory carriage requirements that are tied to their ability to offer local broadcast channels in local markets.<sup>16</sup> While cable operators may invest in infrastructure upgrades that can dramatically increase their available bandwidth, DBS spectrum is a finite resource. Such capacity requirements over time could seriously affect the diversity of programming choices that can be made available to DBS subscribers.

### **C. Dilution of the Program Access Law**

DIRECTV is pleased that the Commission recently extended for five years the statutory prohibition on exclusive contracts between cable operators and cable-affiliated programmers. The Commission found that, absent the prohibition, programmers affiliated with cable providers would have the incentive to favor their cable affiliates over other MVPDs.<sup>17</sup> As DIRECTV has explained in numerous proceedings before the Commission, access to programming controlled by vertically-integrated cable incumbents continues to be a crucial issue for DBS operators.<sup>18</sup>

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<sup>14</sup> 47 U.S.C. § 335; *see also* In the Matter of Section 25 of the Cable Television Consumer Protection and Competition Act of 1992, Direct Broadcast Satellite Public Interest Obligations, *Report and Order*, 13 FCC Rcd 23254 (1998).

<sup>15</sup> In the Matter of Video Description of Video Programming. *Report and Order* 15 FCC Rcd 15,230 (2000), *aff'd*, *Memorandum Opinion and Order on Reconsideration*, 16 FCC Rcd 1251 (2001).

<sup>16</sup> *See* In the Matter of Implementation of the Satellite Home Viewer Act of 1999, Broadcast Signal Carriage Issues, CS Docket No. 00-96, *Report and Order* (rel. Nov. 30, 2000) (petitions for reconsideration pending).

<sup>17</sup> Implementation of the Cable Television Consumer Protection and Competition Act of 1992, Development of Competition and Diversity in Video Programming Distribution: Section 628(c)(5) of the Communications Act, Sunset of Exclusive Contract Prohibition, FCC 02-176, *Report and Order* (rel. June 28, 2002).

<sup>18</sup> *See, e.g., DIRECTV, Inc v. Comcast Corp., et al.*, DA 98-2151, *Memorandum Opinion and Order* (rel. Oct. 27, 1998), *aff'd*, *Memorandum Opinion and Order*, FCC 00-404 (rel. Nov. 20, 2000).

DIRECTV is concerned about the Commission's failure to apply the program access law to programming formerly delivered by satellite that was migrated to a terrestrial delivery mode specifically to evade the law.<sup>19</sup> Although the Commission appropriately retained the prohibition on cable exclusivity through October 5, 2007, it did not clarify that "terrestrial evasion," coupled with a corresponding refusal to sell such programming to an entire class of MVPD competitors, falls squarely within the protective sweep of the program access law.<sup>20</sup> DIRECTV is therefore concerned that the Commission's unduly narrow construction of the law has threatened the ability of DBS operators to secure crucial programming from increasingly clustered and vertically-integrated cable incumbents.

At this critical juncture in which DBS operators and other alternative MVPDs are finally making inroads in the MVPD market, the program access rules are more important than ever. Technological advances that have vastly diminished the costs of delivering programming terrestrially, coupled with the efforts of cable MSOs to "cluster"<sup>21</sup> or trade their systems to form broad, contiguous service areas, have created an environment in which terrestrial distribution has become a more viable method of delivering regional and national programming from production facilities to cable headends. With access to increasingly large geographic regions, incumbent cable operators have begun to use terrestrial distribution as a new tactic to insulate themselves

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<sup>19</sup> See *DIRECTV, Inc v. Comcast Corp., et al.*, 13 FCC Rcd 21,822 (1998), *aff'd*, *Memorandum Opinion and Order*, FCC 00-404 (rel. Nov. 20, 2000); *EchoStar Communications Corp.*, 14 FCC Rcd 2089 (1999) *aff'd* *Memorandum Opinion and Order*, FCC 00-404 (rel. Nov. 20, 2000), Petition for Review pending, *EchoStar v. FCC*, No. 01-1032 (D.C. Cir.).

<sup>20</sup> *Implementation of the Cable Television Consumer Protection and Competition Act of 1992; Development of Competition and Diversity in Video Programming Distribution: Section 628(c)(5) of the Communications Act; Sunset of Exclusive Contract Prohibition*, FCC 02-176, Report and Order (2002) ¶¶ 75-80.

<sup>21</sup> See e.g. *Applications for Consent to the Transfer of Control of Licenses, Comcast Corp. and AT&T Corp., Transferors, to AT&T Comcast Corp., Transferee* (filed Feb. 28, 2002).

from the program access requirements. For these reasons, DIRECTV continues to urge the Commission to carefully monitor the effects of terrestrial distribution of vertically integrated programming by cable operators.

### **III. RESPONSES TO SPECIFIC INFORMATION REQUESTS**

#### **A. Competitors In Markets For The Delivery Of Video Programming**

The Commission seeks factual information and statistical data about the status of video programming distributors and any changes that have occurred during the past year, as well as financial and subscriber information.<sup>22</sup> DIRECTV provides responsive information below.

##### **1. *Subscribership***

As of the end of June 2002, DIRECTV had 10.7 million subscribers compared to about 9.6 million as of June 30, 2001.

##### **2. *Financial Information***

For the second quarter of 2002, DIRECTV (U.S.) had revenue of \$1.55 billion – a 15% increase over 2001 revenues for this period. Also, for the second quarter of 2002, DIRECTV reported EBITDA of \$148 million, which nearly doubled last year's second quarter EBITDA of \$75 million. The operating loss for the second quarter of 2002 was \$53 million, compared with an operating loss of \$38 million in the second quarter of 2001.

##### **3. *Substitution of MVPD Services***

According to internal subscriber data, over half of DIRECTV customers were cable subscribers at the time that they first subscribed to DIRECTV. Of these, the substantial majority cancelled their cable subscription once they activated DIRECTV. A small percentage of DIRECTV subscribers retained some level of cable service in addition to DIRECTV.

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<sup>22</sup> *Id.* at ¶¶ 4-5.

## **B. Direct-To-Home Satellite Services**

The Commission seeks information specific to DBS service providers concerning DBS subscriber attributes, programming packages, and the effects of new local television broadcast channel services on subscribership.<sup>23</sup> DIRECTV provides responsive information below.

### **1. *Identifiable Differences Between DBS and Cable Subscribers***

As between DBS subscribers and subscribers to cable services, DBS subscribers are more likely to live in a single family home, and more likely to live in a rural area. Approximately 55% of DIRECTV's subscribers<sup>24</sup> live in larger urban counties, defined by Nielsen as "A" or "B" counties. "A" counties are those counties in the largest 21 metropolitan areas. "B" counties are all counties with more than 85,000 households (according to the 1990 Census) in metropolitan areas that are not included as "A" counties. In addition, 80% of DIRECTV subscribers live in single family homes. This statistic is tied to anti-competitive "evergreen" and exclusive service contracts between cable operators and multiple dwelling unit ("MDU") owners and other barriers to MDU entry. DIRECTV discusses this issue further below in response to the Commission's inquiries concerning MDU competition.<sup>25</sup>

### **2. *Available Programming and Pricing***

In general, DIRECTV's prices and program packages are comparable to those offered by cable operators. A price and channel list for DIRECTV's program packages is included as Exhibit A. The cost of the DIRECTV system is determined by the retailer.

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<sup>23</sup> Notice at ¶¶ 38-39.

<sup>24</sup> This includes DIRECTV customers served by NRTC affiliates.

<sup>25</sup> Notice at ¶ 8.

### 3. *Local-into-Local Service*

DIRECTV currently offers local broadcast channels in 44 DMAs in full compliance with the mandatory carriage requirements, with 7 more DMAs in the planning stages for roll-out during the remainder of the current year.<sup>26</sup> As of June 30, 2002, over 60% of all paying residential customers are taking the local programming packages, where available.

Customers do not need additional equipment to view local channels delivered from the 101° W.L. orbital location. For those customers who live in markets where their local channels are delivered from the 119° W.L. orbital location (3 DMAs today), equipment that can receive signals from both the 101° W.L. and 119° W.L. orbital locations is available at retail. If a customer has a DIRECTV system that can receive signals from the 101° W.L. orbital location only, the equipment must be replaced with multi-slot equipment to view programming that is broadcast from the 119° W.L. orbital location.

DIRECTV notes that regulatory approval of the EchoStar/Hughes merger will significantly benefit consumers through the expansion of satellite-delivered local broadcast signals. Specifically, the merged company will have the capacity necessary to carry local broadcast stations in all 210 DMAs.

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<sup>26</sup> DIRECTV offers local broadcast channels in the following 44 markets: Atlanta, GA; Austin, TX; Baltimore, MD; Birmingham, AL; Boston, MA; Charlotte, NC; Chicago, IL; Cincinnati, OH; Cleveland, OH; Columbus, OH; Dallas/Ft. Worth, TX; Denver, CO; Detroit, MI; Greensboro, NC; Greenville, SC; Houston, TX; Indianapolis, IN; Kansas City, MO; Los Angeles, CA; Memphis, TN; Miami/Ft. Lauderdale, FL; Milwaukee, WI; Minneapolis/St. Paul, MN; Nashville, TN; New York, NY; Orlando/Daytona, FL; Philadelphia, PA; Phoenix, AZ; Pittsburgh, PA; Portland, OR; Raleigh/Durham, NC; Sacramento/Stockton, CA; Salt Lake City, UT; San Antonio, TX; San Diego, CA; San Francisco/Oakland/San Jose, CA; Seattle/Tacoma, WA; St. Louis, MO; Tampa/St. Petersburg, FL; Washington, D.C.; West Palm Beach, FL; Hartford, CT; Las Vegas, NV; and Providence, RI.



#### 4. ***Geographic Location of DBS Subscribers***

In general, DIRECTV subscribers are distributed evenly across the continental United States. Approximately 55% of DIRECTV's total current subscribers<sup>27</sup> live in urban counties, and 45% live in smaller, rural counties.

#### C. **Programming Issues**

The Commission seeks information concerning ownership of video programming and practices concerning access to such programming, as well as updated information concerning content and packaging.<sup>28</sup> DIRECTV provides responsive information below.

##### 1. ***Affiliations with Programming Networks***

DIRECTV is not affiliated with any programming networks.

##### 2. ***Programming Choices***

DIRECTV offers a number of different program packages in order to accommodate different household income levels and programming interests. DIRECTV's programming information is attached as Exhibit A.

##### 3. ***Programming Descriptions***

DIRECTV carries the following regional sports networks ("RSNs"): Empire Sports Network, Comcast SportsNet Mid-Atlantic, Madison Square Garden (MSG), New England Sports Network, Sunshine Network, YES, and 18 Fox Sports Networks, Fox Sports Arizona, Fox Sports Bay Area, Fox Sports Chicago, Fox Sports Cincinnati, Fox Sports Detroit, Fox Sports Florida, Fox Sports Midwest, Fox Sports New England, Fox Sports New York, Fox Sports North, Fox Sports Northwest, Fox Sports Ohio, Fox Sports Pittsburgh, Fox Sports Rocky Mountain, Fox Sports South, Fox Sports Southwest, Fox Sports West, Fox Sports West 2. Thus,

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<sup>27</sup> This includes DIRECTV customers served by NRTC affiliates.

<sup>28</sup> Notice at ¶¶ 14-17, 39.

with the exception of Philadelphia, DIRECTV carries the RSN in every market that has an RSN. As the Commission is aware, DIRECTV sought to carry the Philadelphia RSN, but was refused access to the programming by Comcast SportsNet.<sup>29</sup>

4. ***Non-commercial Educational or Informational Programming***

DIRECTV currently carries the following eleven channels pursuant to Section 335 of the Communications Act, which requires DBS operators to make available 4% of their channel capacity for noncommercial programming of an educational or informational nature: C-SPAN; Trinity Broadcast Network (TBN); PBS Lifelong Learning; WorldLink TV (LINK); Eternal Word Television Network (EWTN); Clara+Vision (CLAR); Inspirational Life (INSP); NASA-TV; RFD-TV; The Word; and BYU-TV. DIRECTV also carries additional educational channels such as C-SPAN2 and PBS KIDS Channel, but does not include these as part of its carriage obligation under Section 335.<sup>30</sup>

5. ***Closed Captioning and Video Description.***

DIRECTV provides closed captioning on every channel that notifies DIRECTV that it carries closed captioning. DIRECTV provides video description for USA, TBS, TNT, Lifetime, Nickelodeon, Turner Classic Movies, and any local broadcast station that notifies DIRECTV that it carries video description. DIRECTV has 46 local channels for which it has added the Secondary Audio Program channel to carry Descriptive Video Services.

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<sup>29</sup> See *supra* discussion of program access issues in Section II.C.

<sup>30</sup> See 47 C.F.R. § 100.5(c)(4) (limiting the number of channels a single national educational and informational programmer can use to one channel per programmer, until all qualified entities that have sought access have been offered access on at least one channel).

#### **D. Technical Advances**

The Commission seeks comment on the extent to which MVPDs are upgrading their systems and increasing capacity in order to expand their service offerings.<sup>31</sup> The Commission also requests information as to specific services and equipment. DIRECTV provides responsive information below.

##### **1. *System Upgrades***

DIRECTV constantly takes advantage of technical advances to improve and increase services available to its customers. These include interactive television technologies (DIRECTV INTERACTIVE™ powered by Wink Communications®) providing information and e-commerce; High Definition Television ("HDTV") broadcast technologies to provide HDTV services (DIRECTV currently offers 3 national channels of HDTV programming and some HDTV pay-per-view offerings); consumer electronics technologies enabling less expensive receivers and more receiver options for DIRECTV customers; digital video recording technologies enabling PVR capabilities for consumers, such as the DIRECTV Receiver with TiVo® and spot-beam spacecraft technologies enabling additional local channel markets.

DIRECTV has offered digitally compressed signals from its inception, and has substantially reached current technological limits on digital compression with respect to capacity on its existing satellites. Although there are potentially very small gains still possible through the use of advanced algorithms, such technological developments can neither be predicted nor relied upon as a means of increasing system channel capacity.

In the past year, DIRECTV has launched two additional spacecraft so that DIRECTV can more effectively use its assigned frequencies. Specifically, DIRECTV launched its DIRECTV 5

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<sup>31</sup> Notice at ¶¶ 21-23, 40.

satellite<sup>32</sup> on May 7, 2002, which has enabled DIRECTV to utilize its frequencies at the 119° W.L. orbital location more efficiently and with increased redundancy. In addition, on November 26, 2001, DIRECTV launched and now operates the DIRECTV 4S satellite<sup>33</sup> at the 101° W.L. orbital location. DIRECTV 4S is a state-of-the-art spot-beam satellite that facilitates DIRECTV's provision of local broadcast channel service in 41 television markets across the nation.

## **2. *Internet Access***

With respect to Internet-access services, DIRECTV, through its DIRECTV Broadband affiliate, offers DIRECTV DSL, an "always-on" Internet connection with speeds up to 50 times greater than standard dial-up modems, and, through its sister company, Hughes Network Systems, DIRECWAY, a satellite-based Internet service.

## **3. *Consumer Equipment***

Since its establishment in 1994, DIRECTV has had a rigorous test program for consumer equipment design before making commitments to large-scale production. This test program has encouraged multiple manufacturers to compete in the development and marketing of set-top boxes and other consumer equipment to serve the DBS subscriber market. DIRECTV consumer equipment (including set-top boxes and integrated high-definition television sets) is manufactured and/or distributed by a wide variety of consumer electronics manufacturers, including: Hughes Network Systems, Mitsubishi, Panasonic, Philips, Samsung, Sony, Thomson Consumer Electronics, Toshiba, and Zenith.

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<sup>32</sup> See File No. SAT-LOA-20000505-0086, *Order and Authorization* (Nov. 27, 2000).

<sup>33</sup> *DIRECTV Enterprises, Inc. Application to Launch and Operate a Direct Broadcast Satellite Service Space Station*, Order and Authorization, 16 FCC 18530 (2001).

Virtually all DIRECTV consumer equipment is available at more than 26,000 retail outlets. The channels of distribution include: major retail outlets such as Circuit City, Best Buy, Radio Shack, and others; discount retailers such as Wal-Mart and K-Mart; independent retailers such as Good Guys, Ultimate Electronics, and others; and thousands of independent satellite TV dealers nationwide. DIRECTV Systems also are available for purchase from Blockbuster, the DIRECTV direct sales channel (accessed either through [www.directv.com](http://www.directv.com) or 1-800-DIRECTV), and through e-commerce.

Set-top box products are not interchangeable with those used by different MVPDs, as the major MVPDs (satellite and cable) all have significant technical, operating, and security differences. DIRECTV and other MVPD providers, however, have worked extensively with consumer electronics manufacturers to maximize compatibility at the chip level and thereby reduce the overall cost of equipment to the subscriber.

#### 4. *Electronic Programming Guides*

All DIRECTV subscribers receive a full interactive electronic programming guide (“EPG”). DIRECTV’s EPG is produced nationally but allows for local customization of channel lineups. DIRECTV’s EPG was developed by and is owned by DIRECTV, and is specific to DIRECTV’s digital DBS system. Because DIRECTV’s EPG system is specific to its own encoding and processing infrastructure, only DIRECTV’s subscribers may access it. In contrast to EPGs offered by cable operators, DIRECTV does not charge its subscribers any additional fees for the service, nor is DIRECTV’s EPG supported by advertising.

E. **Multiple Dwelling Units (“MDUs”)**

The Commission seeks information on what factors influence MVPD competition in MDUs, and information on the use of exclusive and “evergreen” video service contracts in MDUs.<sup>34</sup> DIRECTV provides responsive information below.

1. ***Competition in MDUs***

As DIRECTV has explained previously, many residents of MDUs do not enjoy a choice of video providers, as cable incumbents continue to control the market for the provision of video programming services to MDUs. The cable industry’s success in thwarting competition is fundamentally due to exclusive service contracts or exclusive “rights of entry” that do not allow MDU property owners and landlords to procure video programming services from an alternative service provider. In many cases, such contracts include an “evergreen” term based on the incumbent’s franchise renewal. As a consequence, DIRECTV’s penetration, particularly in urban areas, has been affected. While DIRECTV’s penetration is roughly evenly distributed throughout the United States, DIRECTV has lower penetration rates in certain large metropolitan areas in which a large percentage of consumers live in MDUs.

2. ***Effectiveness of OTARD Rule***

DIRECTV supports the over-the-air reception device (“OTARD”) rule and the Commission’s vigorous enforcement of that rule. The FCC’s OTARD rule has been somewhat helpful to a select segment of MDU residents in obtaining DBS service; in particular, it has helped those residents who have balconies and/or patios within the proper line of sight to receive DBS signals.<sup>35</sup> The Commission’s OTARD decisions have encouraged some MDU landlords

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<sup>34</sup> Notice at ¶ 8.

<sup>35</sup> *See In the Matter of Restrictions on Over-the-Air Reception Devices: Television Broadcast, Multichannel Multipoint Distribution and Direct Broadcast Satellite Services,*

and owners to seek DTH distribution systems that use a single common dish for reception to prevent “dish clutter” in their MDU communities. However, the OTARD rule has not assisted residents of apartments, condominiums and other MDUs who lack an exclusive-use area suitable for antenna installation (*e.g.*, a south-facing balcony or patio). DIRECTV believes that the rule should be extended to renters and owners who do not have exclusive use of areas suitable for antenna installation.

#### IV. CONCLUSION

DIRECTV hopes the foregoing information is useful to the Commission in taking action to promote the continued emergence of competition in the MVPD market.

Respectfully submitted,

DIRECTV, Inc.

By: 

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James H. Barker

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LATHAM & WATKINS

555 Eleventh Street, NW

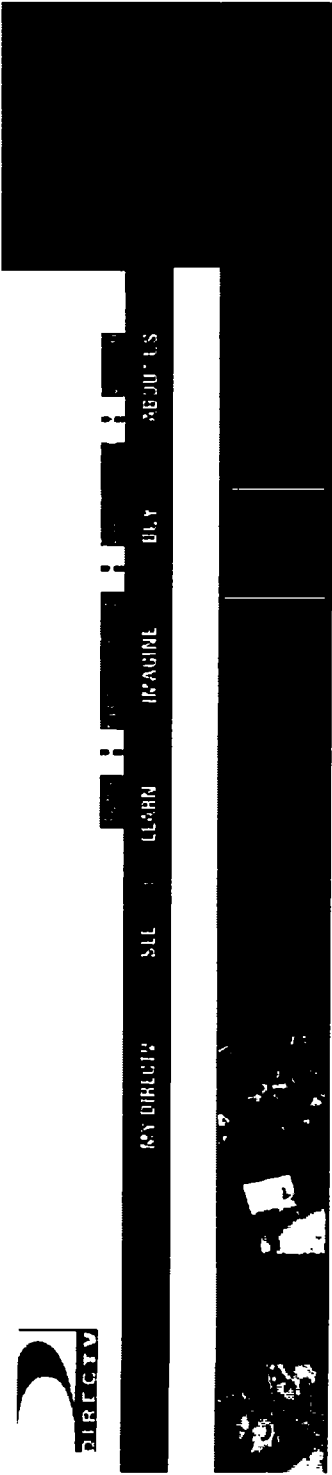
Suite 1000

Washington, D.C. 20004-1304

(202) 637-2200

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CS Docket No. 96-83, Second Report and Order, 13 FCC Rcd 23874 (1998), *aff'd*,  
*Building Owners and Managers Ass'n v. FCC*, No. 99-1021 (D.C. Cir. 2001).



**LEARNING**  
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**DIRECTV Packages Comparison**

▶ <b>DIRECTV® packages</b>				
▶ <b>DIRECTV® Channel lineup</b>	<b>Channel</b>	<b>TOTAL CHOICE® \$31.99/mo.</b>	<b>TOTAL CHOICE® PLUS \$35.99/mo.</b>	<b>TOTAL CHOICE® PREMIER \$81.99/mo.</b>
▶ <b>DIRECTV® service in 5 easy steps</b>	A&E	*	*	*
▶ <b>How does DIRECTV technology work?</b>	ABC Family	*	*	*
▶ <b>Local channel availability</b>	Action			*
	All News Channel	*	*	*
	American Movie Classics	*	*	*
	Animal Planet	*	*	*
	BBC America	*	*	*
	The Biography Channel		*	*
	Black Entertainment Television	*	*	*
	BLACK STARZ!			*
	Bloomberg Television	*	*	*
	Boomerang		*	*
	Bravo	*	*	*
	Cartoon Network	*	*	*
	The Church Channel	*	*	*



Cinemax				*
Cinemax West				*
CNBC	*		*	*
CNN	*		*	*
CNNfn/CNN International	*		*	*
Comedy Central	*		*	*
Country Music Television	*		*	*
Court TV	*		*	*
C-SPAN	*		*	*
C-SPAN 2	*		*	*
Daystar	*		*	*
Discovery Channel	*		*	*
Discovery Civilization			*	*
Discovery Health Channel	*		*	*
Discovery Home & Leisure			*	*
Discovery Kids Channel			*	*
Discovery Wings			*	*
Disney Channel East	*		*	*
Disney Channel West	*		*	*
Do It Yourself Network			*	*
E! Entertainment Television	*		*	*
Encore East				*
Encore West				*
ESPN	*		*	*
ESPN CLASSIC	*		*	*
ESPN 2	*		*	*
ESPNEWS	*		*	*

FLIX				*
Food Network	*		*	*
Fox Movie Channel	*		*	*
Fox News Channel	*		*	*
Fox Sports World				*
FX	*		*	*
Galavision	*		*	*
Game Show Network	*		*	*
The Golf Channel				*
Hallmark Channel	*		*	*
HBO				*
HBO Family				*
HBO Family West				*
HBO2				*
HBO2 West				*
HBO Signature				*
HBO West				*
Headline News	*		*	*
The Health Network	*		*	*
The History Channel	*		*	*
History International			*	*
Home & Garden Television	*		*	*
Home Shopping Network	*		*	*
The Independent Film Channel	*		*	*
The Learning Channel	*		*	*
Lifetime	*		*	*
Lifetime Movie Network	*		*	*





Love Stories			*
MoreMAX			*
The Movie Channel East			*
The Movie Channel West			*
MSNBC	*		*
MTV	*		*
MTV2	*		*
MuchMusic	*		*
Music Choice: 70s	*		*
Music Choice: 80s	*		*
Music Choice: Alternative Rock	*		*
Music Choice: American Originals	*		*
Music Choice: Atmospheres	*		*
Music Choice: Big Band	*		*
Music Choice: Body & Soul			*
Music Choice: Blues	*		*
Music Choice: Channel X	*		*
Music Choice: Classic Country	*		*
Music Choice: Classic Light	*		*
Music Choice: Classic R&B			*
Music Choice: Classic Rock	*		*
Music Choice: Classical Masterpieces	*		*
Music Choice: Contemporary Christian	*		*
Music Choice: Dance	*		*
Music Choice: Easy Listening	*		*
Music Choice: For Kids Only			*

Music Choice: Gospel	*	*	*
Music Choice: Hit List	*	*	*
Music Choice: Jazz	*	*	*
Music Choice: Light Jazz	*	*	*
Music Choice: Metal	*	*	*
Music Choice: New Releases	*	*	*
Music Choice: Progressive	*	*	*
Music Choice: R&B Hits	*	*	*
Music Choice: Rap	*	*	*
Music Choice: Rock Hits		*	*
Music Choice: Showcase	*	*	*
Music Choice: Showcase II		*	*
Music Choice: Singers & Standards	*	*	*
Music Choice: Soft Rock	*	*	*
Music Choice: Solid Gold Oldies	*	*	*
Music Choice: Sounds of the Season	*	*	*
Music Choice: Today's Country	*	*	*
Music Choice: World Beat	*	*	*
Mystery			*
National Geographic Channel	*	*	*
The National Network	*	*	*
NBA TV			*
Newsworld International	*	*	*
Nickelodeon/Nick at Nite (East)	*	*	*
Nickelodeon/Nick at Nite (West)	*	*	*
Noggin/The N	*	*	*

Outdoor Life Network	*	*	*
Oxygen	*	*	*
PAX	*	*	*
PBS KIDS Channel		*	*
PBS YOU	*	*	*
QVC	*	*	*
Regional Sports Networks	1 in-market RSN	1 in-market RSN	All RSNs listed below
SCI FI Channel	*	*	*
The Science Channel		*	*
Shop At Home	*	*	*
ShopNBC	*	*	*
SHOWTIME East			*
SHOWTIME Extreme			*
SHOWTIME Showcase			*
SHOWTIME TOO			*
SHOWTIME West			*
SoapNet		*	*
Speed Channel	*	*	*
STARZ!			*
STARZ! Theater			*
STARZ! West			*
Sundance Channel			*
TBS Superstation	*	*	*
TechTV	*	*	*
TNT	*	*	*
Toon Disney	*	*	*

Travel Channel	*	*	*
Trinity Broadcasting Network	*	*	*
TRIO	*	*	*
True Stories			*
Turner Classic Movies	*	*	*
Turner South**	*	*	*
TV Land	*	*	*
Univision	*	*	*
USA Network	*	*	*
VH1	*	*	*
VH1 Classic		*	*
WAM!			*
WE: Women's Entertainment	*	*	*
The Weather Channel	*	*	*
Westerns			*
WGN Superstation	*	*	*
Word Network	*	*	*
WorldLink TV	*	*	*
<b>Regional Sports Networks*</b>			
Comcast SportsNet (Mid-Atlantic)			*
Empire Sports Network			*
Fox Sports Net Arizona			*
Fox Sports Net Bay Area			*
Fox Sports Net Chicago			*
Fox Sports Net Cincinnati			*
Fox Sports Net Detroit			*





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**Learning Center**

- └ DIRECTV® packages
- └ DIRECTV® Channel lineup
- └ DIRECTV® service in 5 easy steps
- └ How does DIRECTV technology work?
- └ Local channel availability

**DIRECTV PARA TODOS™ Packages Comparison**

	OPCION EXTRA ESPECIAL®	OPCION ULTRA ESPECIAL™	OPCION PREMIER™
	\$31.99 al mes / per month	\$35.99 al mes / per month	\$81.99 al mes / per month
<b>Spanish-Language Channels</b>			
Boomerang (ESP)		*	*
Canal Sur	*	*	*
Cartoon Network (ESP)	*	*	*
Cine Latino	*	*	*
Clara+Visión*	*	*	*
CNN en Español	*	*	*
Discovery en Español	*	*	*
EWTN*	*	*	*
Fox Sports World Español	*	*	*
Galavisión	*	*	*
HBO Latino			*
MTV Español	*	*	*
mun2	*	*	*





American Movie Classics	*	*	*
Animal Planet	*	*	*
Arts & Entertainment (A&E)	*	*	*
The Biography Channel		*	*
Black Entertainment Television	*	*	*
Black STARZ!			*
Bloomberg Television	*	*	*
Bravo	*	*	*
The Church Channel	*	*	*
Cinemax			*
Cinemax West			*
CNN	*	*	*
Comedy Central	*	*	*
Country Music Television (CMT)	*	*	*
Court TV	*	*	*
C-SPAN	*	*	*
C-SPAN 2	*	*	*
DayStar	*	*	*
Discovery Channel	*	*	*
Discovery Civilization		*	*
Discovery Home & Leisure		*	*
Discovery Kids Channel		*	*
Discovery Wings		*	*
Disney Channel East	*	*	*
Disney Channel West	*	*	*
Do It Yourself Network		*	*
E! Entertainment Television	*	*	*

Encore East			*
Encore West			*
ESPN	*	*	*
ESPN 2	*	*	*
ESPNEWS	*	*	*
FLIX			*
Food Network	*	*	*
Fox Sports World			*
FX	*	*	*
Game Show Network	*	*	*
The Golf Channel			*
Hallmark Channel	*	*	*
HBO East			*
HBO Family East			*
HBO Family West			*
HBO2 East			*
HBO2 West			*
HBO Signature			*
HBO West			*
Headline News	*	*	*
Health Network	*	*	*
The History Channel	*	*	*
History International		*	*
Home & Garden Television	*	*	*
Home Shopping Network	*	*	*
Independent Film Channel	*	*	*
Inspirational Life†	*	*	*

The Learning Channel	*	*	*
Lifetime	*	*	*
Love Stories			*
MoreMAX			*
The Movie Channel East			*
The Movie Channel West			*
MSNBC	*	*	*
MTV	*	*	*
MTV2	*	*	*
Music Choice - English (31 OEE/36 OUE)	*	*	*
Mystery			*
NASA TV†	*	*	*
National Geographic Channel	*	*	*
The National Network	*	*	*
NBA TV			*
Newsworld International	*	*	*
Nickelodeon/Nick at Nite (East)	*	*	*
Nickelodeon/Nick at Nite (West)	*	*	*
Noggin/The N	*	*	*
Outdoor Life Network	*	*	*
Oxygen	*	*	*
PBS KIDS Channel		*	*
PBS YOU†	*	*	*
QVC	*	*	*
Regional Sports Networks	1 in-market RSN	1 in-market RSN	All RSNs listed below
RFD_TV†	*	*	*

SCI FI Channel	*	*	*
The Science Channel		*	*
Shop At Home	*	*	*
ShopNBC	*	*	*
SHOWTIME East			*
SHOWTIME Extreme			*
SHOWTIME Showcase			*
SHOWTIME TOO			*
SHOWTIME West			*
SoapNet		*	*
Speed Channel	*	*	*
STARZ! East			*
STARZ! Theater East			*
STARZ! West			*
Sundance			*
TBS Superstation	*	*	*
TNT	*	*	*
Travel Channel	*	*	*
Trinity Broadcasting Network†	*	*	*
TRIO	*	*	*
True Stories			*
Turner Classic Movies	*	*	*
TV Land	*	*	*
USA Network	*	*	*
VH1	*	*	*
VH1 Classic		*	*
WAM!			*

WE: Women's Entertainment	*	*	*
The Weather Channel	*	*	*
Westerns			*
Word Network†	*	*	*
WorldLink TV†	*	*	*
<b>Regional Sports Networks</b>			
Comcast SportsNet (Mid-Atlantic)			*
Empire Sports Network			*
Fox Sports Net Arizona			*
Fox Sports Net Bay Area			*
Fox Sports Net Chicago			*
Fox Sports Net Cincinnati			*
Fox Sports Net Detroit			*
Fox Sports Net Florida			*
Fox Sports Net Midwest			*
Fox Sports Net New England			*
Fox Sports Net New York			*
Fox Sports Net North			*
Fox Sports Net Northwest			*
Fox Sports Net Ohio			*
Fox Sports Net Pittsburgh			*
Fox Sports Net Rocky Mountain			*
Fox Sports Net South			*
Fox Sports Net Southwest			*
Fox Sports Net West			*
Fox Sports Net West 2			*
Madison Square Garden (MSG)			*

- New England Sports Network \*
- Sunshine Network \*

(ESP)=Canal transmitido en inglés con acceso a audio en español

Para tener acceso a la mayoría de los canales en español mencionados arriba, se requiere un Sistema DIRECTV Multi-Satelite apropiadamente instalado.

- \*Gratis para todos los clientes que tienen un Sistema DIRECTV Multi-Satelite.
- \*\*Estos canales de Music Choice podrian no estar disponibles en las áreas limitadas cubiertas por los afiliados de la Cooperativa Nacional de Comunicaciones Rurales.
- †Para tener acceso a estos canales, se requiere un Sistema DIRECTV Multi-Satelite apropiadamente instalado.

Programación y precios sujetos a cambio. El equipo y la programación se venden por separado. Los paquetes OPCION ESPECIAL y OPCION EXTRA ESPECIAL podrian no estar disponibles en las áreas limitadas cubiertas por los afiliados de la Cooperativa Nacional de Comunicaciones Rurales.

(ESP)=English-language broadcast with Spanish-language audio access

To get access to most of the Spanish-language channels listed above, you must have a DIRECTV Multi-Satellite System properly installed.

- \*Free to all customers who have a DIRECTV Multi-Satellite System.
- \*\*These Music Choice channels may not be available in the limited areas served by members or affiliates of the National Rural Telecommunications Cooperative.
- †To access these channels, you must have a DIRECTV Multi-Satellite System properly installed.

Programming and pricing subject to change. Hardware and programming sold separately. OPCION ESPECIAL and OPCION EXTRA ESPECIAL value packages may not be available in the limited areas served by members or affiliates of the National Rural Telecommunications Cooperative.

Sign Up Now With DIRECTV.com

Programas en español

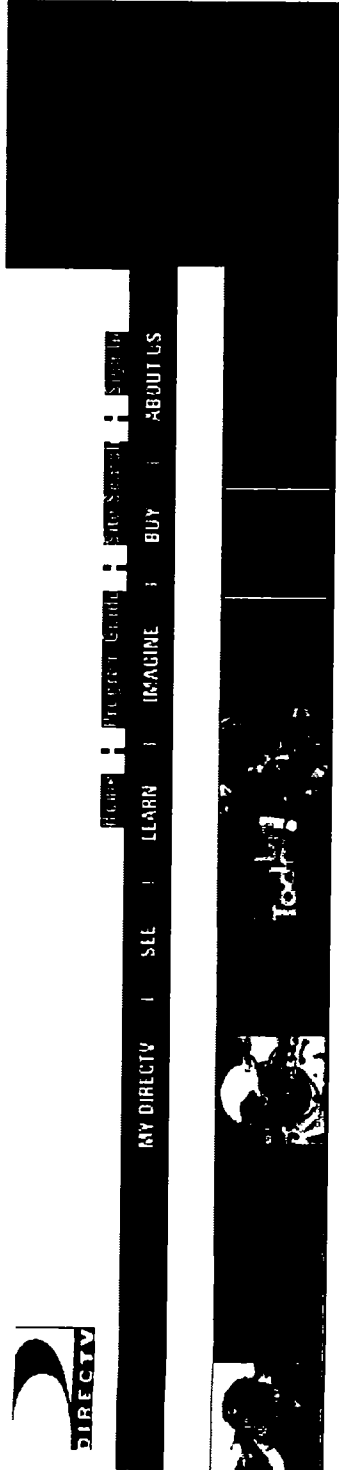
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View channels in numerical order.

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└ DIRECTV® Channel lineup

└ DIRECTV® service in 5 easy steps

└ How does DIRECTV technology work?

└ Local channel availability

DIRECTV Channel Lineup (Alphabetical)

DIRECTV Channel	Channel Number
A&E	265
ABC Family	311
Action	532
Adult Variety/Pleasure Island	594
All News Channel	364
American Movie Classics	254
Animal Planet	282
BBC America	264
The Biography Channel	266
Black Entertainment Television	329
BLACK STARZ!	523
Bloomberg Television	353
Boomerang	297
Bravo	273
Cartoon Network	296
The Church Channel	371



Cinemax East	512
Cinemax West	514
CNBC	355
CNN	202
CNNfn/CNN International	358
Comcast SportsNet (Mid-Atlantic)	629
Comedy Central	249
Country Music Television	327
Court TV	203
C-SPAN	350
C-SPAN 2	351
Daystar	369
Discovery Channel	278
Discovery Civilization	285
Discovery Health Channel	279
Discovery Home & Leisure	286
Discovery Kids Channel	294
Discovery Wings	287
Disney Channel East	290
Disney Channel West	291
Do It Yourself Network	230
E! Entertainment Television	236
Empire Sports Network	626
Encore East	526
Encore West	527
ESPN	206
ESPN CLASSIC	208

ESPN 2	209
ESPNEWS	207
FLIX	547
Food Network	231
Fox Movie Channel	258
Fox News Channel	360
Fox Sports Net Arizona	649
Fox Sports Net Bay Area	654
Fox Sports Net Chicago	639
Fox Sports Net Cincinnati	638
Fox Sports Net Detroit	636
Fox Sports Net Florida	634
Fox Sports Net Midwest	647
Fox Sports Net New England	620
Fox Sports Net New York	624
Fox Sports Net North	641
Fox Sports Net Northwest	651
Fox Sports Net Ohio	637
Fox Sports Net Pittsburgh	628
Fox Sports Net Rocky Mountain	645
Fox Sports Net South	630
Fox Sports Net Southwest	643
Fox Sports Net West	652
Fox Sports Net West 2	653
Fox Sports World	613
FX	248
Galavision	404

Game Show Network	309
The Golf Channel	605
Hallmark Channel	312
HBO	501
HBO Family	507
HBO Family West	508
HBO2	502
HBO2 West	505
HBO Signature	503
HBO West	504
Headline News	204
The Health Network	368
The History Channel	269
History International	271
Home & Garden Television	229
Home Shopping Network	240
The Hot Network* (Adult)	597
The Hot Zone (Adult)	598
The Independent Film Channel	550
The Learning Channel	280
Lifetime	252
Lifetime Movie Network	253
Love Stories	528
Madison Square Garden (MSG)	621
MoreMAX	513
The Movie Channel East	544
The Movie Channel West	545

MSNBC	356
MTV	331
MTV2	333
MuchMusic	339
Music Choice: 70s	824
Music Choice: 80s	823
Music Choice: Alternative Rock	817
Music Choice: American Originals	805
Music Choice: Atmospheres	838
Music Choice: Big Band	830
Music Choice: Body & Soul	810
Music Choice: Blues	841
Music Choice: Channel X	813
Music Choice: Classic Country	829
Music Choice: Classic Light	836
Music Choice: Classic R&B	809
Music Choice: Classic Rock	819
Music Choice: Classical Masterpieces	834
Music Choice: Contemporary Christian	843
Music Choice: Dance	812
Music Choice: Easy Listening	833
Music Choice: For Kids Only	807
Music Choice: Gospel	842
Music Choice: Hit List	822
Music Choice: Jazz	840
Music Choice: Light Jazz	839
Music Choice: Metal	816

Music Choice: New Releases	804
Music Choice: Progressive	818
Music Choice: R&B Hits	811
Music Choice: Rap	814
Music Choice: Rock Hits	820
Music Choice: Showcase	802
Music Choice: Showcase II	803
Music Choice: Singers & Standards	831
Music Choice: Soft Rock	821
Music Choice: Solid Gold Oldies	825
Music Choice: Sounds of the Season	806
Music Choice: Today's Country	828
Music Choice: World Beat	808
Mystery	530
National Geographic Channel	276
The National Network	325
NBA TV	720
New England Sports Network	623
Newsworld International	366
Nickelodeon/Nick at Nite (East)	299
Nickelodeon/Nick at Nite (West)	300
Noggin/The N	298
Outdoor Life Network	608
Oxygen	251
PAX	255
PBS KIDS Channel	295
PBS YOU	377

Playboy TV (Adult)	595
QVC	317
SCI FI Channel	244
The Science Channel	284
Shop At Home	234
ShopNBC	370
SHOWTIME East	537
SHOWTIME Extreme	542
SHOWTIME Showcase	539
SHOWTIME TOO	538
SHOWTIME West	540
SoapNet	262
Speed Channel	607
STARZ! East	520
STARZ! Theater	522
STARZ! West	521
Sundance Channel	549
Sunshine Network	632
TBS Superstation	247
TechTV	354
TNT	245
Toon Disney	292
Travel Channel	277
Trinity Broadcasting Network	372
TRIO	315
True Stories	531
Turner Classic Movies	256

Turner South	631
TV Land	301
Univision	402
USA Network	242
VH1	335
VH1 Classic	337
VIVID TV* (Adult)	596
WAM!	533
WE: Women's Entertainment	260
The Weather Channel	362
Westerns	529
WGN Superstation	Eastern Prime Time 307
Word Network	373
WorldLink TV	375

\*Subject to blackout areas. The DIRECTV System has a "locks and limits" feature which allows you to restrict access to movies based on the MPAA rating system, or block the viewing of entire channels.

Programming subject to change.

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# Programming in Hawaii

Hawaii Channel Lineup and Comparison Chart			
Channel	Channel Number	HAWAII CHOICE PLUS™	OPCIÓN HAWAII PLUS™
American Movie Classics (AMC)	254	*	*
Animal Planet	282	*	*
Biography Channel	266	*	*
Boomerang	297	*	*
Bravo	273	*	*
Comedy Central	249	*	*
Court TV	203	*	*
C-SPAN 2	351	*	*
Discovery Kids	294	*	*
Do-It-Yourself Network	230	*	*
E! Entertainment Television	236	*	*
Food Network	231	*	*
Fox Movie Channel	258	*	*
Fox News Channel	360	*	*
Fox Sports Net West	652	*	*
Fox Sports Net West 2	653	*	*
FX	248	*	*
Galavision	404	*	*
The Golf Channel	605	*	*
The History Channel	269	*	*
Home & Garden Television (HGTV)	229	*	*
Home Shopping Network	240	*	*
The Learning Channel (TLC)	280	*	*
Lifetime	252	*	*
MSNBC	356	*	*
MTV	331	*	*
MTV2	333	*	*
Nickelodeon/Nick at Nite (West)	300	*	*
Noggin	298	*	*
Odyssey	312	*	*
PAX TV	255	*	*
PBS KIDS	295	*	*
QVC	317	*	
SCI FI Channel	244	*	
SoapNet	262	*	
Speedvision	607	*	
STARZ! Theater East	522	*	
STARZ! West	521	*	*
Toon Disney	292	*	
Travel Channel	233	*	
TV Land	301	*	
Univision	402	*	*
ShopNBC	370	*	*
VH1	335	*	*
Canal Sur	420		*
Cine Latino	423		*
Channel J	440		*
CNN en Español	419		*
Discovery en Español	413		*
Fox Sports World Español	425		*
GEMS Televisión	410		*
HBO Latino	511		*
MTV S	416		*
MUSIC CHOICE Boleros (audio)	846		*
MUSIC CHOICE Canciones de Amor Internacional (audio)	848		*
MUSIC CHOICE Folklórica (audio)	845		*
MUSIC CHOICE Música Latina (audio)	847		*
PUMA TV	417		*
Telefe	411		*
Telemundo East	405		*
Telemundo Internacional	418		*
Telemundo West	406		*
TV Chile Internacional	408		*
TV Española Internacional	407		*
Univisión (West)	403		*
Utilísima	409		*
The Weather Channel/El Canal del Tiempo	421		*